# **EXHIBIT A**

In re:

Chapter 11

W.R. GRACE & CO., et al.,

Casc No. 01-01139 (JKF)

Debtors.

Jointly Administered

Ref. No. 20622

### NOTICE OF VIDEO PERPETUATION DEPOSITION OF ROBERT BARNES

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Robert Barnes. The deposition will commence on May 14, 2009, beginning at 9:00 am, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009

Wilmington, Delaware

LANDIS RATH & COBB LLP

Adam G. Landis (No. 3407) Kerri K. Mumford (No. 4186) 919 Market Street, Suite 1800

Wilmington, DE 19801 Telephone: (302) 467-4400

Facsimile: (302) 467-4450

<sup>&</sup>lt;sup>1</sup> As identified in the Amended and Restated Verified Statement of Cohn Whitesell & Goldberg LLP and Landis Rath & Cobb LLP Pursuant to Fed. R. Bankr. P. 2019 [Docket No. 19927].

Daniel C. Cohn Christopher M. Candon COHN WHITESELL & GOLDBERG LLP 101 Arch Street Boston, MA 02110

Telephone: (617) 951-2505 Facsimile: (617) 951-0679

|                           | Ref. No. 20622          |
|---------------------------|-------------------------|
| Debtors.                  | Jointly Administered    |
| W.R. GRACE & CO., et al., | Case No. 01-01139 (JKF) |
| In re:                    | Chapter 11              |

### NOTICE OF VIDEO PERPETUATION DEPOSITION OF LINDA COLLINSON

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Linda Collinson. The deposition will commence on May 20, 2009, beginning at 1:30 pm, at the Flathead Valley Community College, Room 113, 225 Commerce Way, Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware

LANDIS RATH & COBB LLP

Adam G. Landis (No. 3407) Kerri K. Mumford (No. 4186) 919 Market Street, Suite 1800 Wilmington, DE 19801

Telephone: (302) 467-4400 Facsimile: (302) 467-4450

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In re:

Chapter 11

W.R. GRACE & CO., et al.,

Case No. 01-01139 (JKF)

Debtors.

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Ref. No. 20622

### NOTICE OF VIDEO PERPETUATION DEPOSITION OF ROBERT CONN

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Robert Conn. The deposition will commence on May 14, 2009, beginning at 1:30 pm, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware

LANDIS RATH & COBB LLP

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Wilmington, DE 19801

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Daniel C. Cohn
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Telephone: (617) 951-2505

Counsel for Libby Claimants

Facsimile: (617) 951-0679

| In re:                    | Chapter 11              |
|---------------------------|-------------------------|
| W.R. GRACE & CO., et al., | Case No. 01-01139 (JKF) |
| Debtors.                  | Jointly Administered    |
| •                         | Ref No. 20622           |

#### NOTICE OF VIDEO PERPETUATION DEPOSITION OF SHIRLEY CONN

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Shirley Conn. The deposition will commence on May 13, 2009, beginning at 9:00 am at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware

LANDIS RATH & COBB LLP

Adam G. Landis (No. 3407) Kerri K. Mumford (No. 4186) 919 Market Street, Suite 1800 Wilmington, DE 19801

Telephone: (302) 467-4400 Facsimile: (302) 467-4450

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In re:

Chapter 11

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Jointly Administered

Ref. No. 20622

### NOTICE OF VIDEO PERPETUATION DEPOSITION OF RICHARD ERICKSON

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Richard Erickson. The deposition will commence on May 12, 2009, beginning at 9:00 am, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware

LANDIS RATH & COBB LLP

Adam G. Landis (No. 3407) Kerri K. Mumford (No. 4186)

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Telephone: (302) 467-4400 Facsimile: (302) 467-4450

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Counsel for Libby Claimants

Facsimile: (617) 951-0679

În re:

Chapter 11

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#### NOTICE OF VIDEO PERPETUATION DEPOSITION OF GERALDINE FLETCHER

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Geraldine Fletcher. The deposition will commence on May 21, 2009, beginning at 9:00 am, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware

LANDIS RATH & COBB LLP

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In re:

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Ref. No. 20622

### NOTICE OF VIDEO PERPETUATION DEPOSITION OF BILL FORE

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Bill Fore. The deposition will commence on May 19, 2009, beginning at 9:00 am, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses

Dated: April 21, 2009 Wilmington, Delaware

LANDIS RATH & COBB LLP

Adam G. Landis (No. 3407) Kerri K. Mumford (No. 4186)

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Counsel for Libby Claimants

Facsimile: (617) 951-0679

In re:

Chapter 11

W.R. GRACE & CO., et al.,

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Ref. No. 20622

#### NOTICE OF VIDEO PERPETUATION DEPOSITION OF HAZEL HALSEY

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Hazel Halsey. The deposition will commence on May 22, 2009, beginning at 9:00 am, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware LANDIS RATH & COBB LLP

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In re:

Chapter 11

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Ref. No. 20622

#### NOTICE OF VIDEO PERPETUATION DEPOSITION OF LARRY HILL

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Larry Hill. The deposition will commence on May 15, 2009, beginning at 9:00 am, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009

Wilmington, Delaware

LANDIS RATH & COBB LLP

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#### NOTICE OF VIDEO PERPETUATION DEPOSITION OF PATRICIA HILL

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Patricia Hill. The deposition will commence on May 19, 2009, beginning at 1:30 pm, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware

LANDIS RATH & COBB LLP

Adam G. Landis (No. 3407)<sup>b</sup> Kerri K. Mumford (No. 4186) 919 Market Street, Suite 1800 Wilmington, DE 19801

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- and - '

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In re:

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W.R. GRACE & CO., et al.,

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### NOTICE OF VIDEO PERPETUATION DEPOSITION OF JAMES HOPKINS

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of James Hopkins. The deposition will commence on May 13, 2009, beginning at 1:30 pm, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware

LANDIS RATH & COBB LLP

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In re:

Chapter 11

W.R. GRACE & CO., et al.,

Case No. 01-01139 (JKF)

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Ref. No. 20622

### NOTICE OF VIDEO PERPETUATION DEPOSITION OF ELEANORA MARTIN

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Eleanora Martin. The deposition will commence on May 12, 2009, beginning at 1:30 pm, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware

LANDIS RATH & COBB LLP

Adam G. Landis (No. 3407)

Kerri K. Mumford (No. 4186)

919 Market Street, Suite 1800

Wilmington, DE 19801

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In re:

W.R. GRACE & CO., et al.,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)

Jointly Administered

Ref. No. 20622

#### NOTICE OF VIDEO PERPETUATION DEPOSITION OF LARRY NELSON

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Larry Nelson. The deposition will commence on May 21, 2009, beginning at 1:30 pm, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware LANDIS RATH & COBB LLP

Aflam G. Landis (No. 3407) Kerri K. Mumford (No. 4186) 919 Market Street, Suite 1800 Wilmington, DE 19801

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In re:

Chapter 11

W.R. GRACE & CO., et al.,

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### NOTICE OF VIDEO PERPETUATION DEPOSITION OF ROBERT PETRUSHA

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Robert Petrusha. The deposition will commence on May 20, 2009, beginning at 9:00 am, at the Flathead Valley Community College, Room 113, 225 Commerce Way, Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009

Wilmington, Delaware

LANDIS RATH & COBB LLP

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#### NOTICE OF VIDEO PERPETUATION DEPOSITION OF BILLIE SCHULL

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Billie Schull. The deposition will commence on May 18, 2009, beginning at 9:00 am, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009
Wilmington, Delaware

LANDIS RATH & COBB LLP

Adam G. Landis (No. 3407) Kerri K. Mumford (No. 4186)

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#### NOTICE OF VIDEO PERPETUATION DEPOSITION OF JUDY SHELMERDINE

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Judy Shelmerdine. The deposition will commence on May 22, 2009, beginning at 1:30 pm, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware

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| In re:                    | Chapter 11              |
|---------------------------|-------------------------|
| W.R. GRACE & CO., et al., | Case No. 01-01139 (JKF) |
| Debtors.                  | Jointly Administered    |
|                           | Ref. No. 20622          |

#### NOTICE OF VIDEO PERPETUATION DEPOSITION OF DONNA SHRINER

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Donna Shriner. The deposition will commence on May 15, 2009, beginning at 1:30 pm, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009 Wilmington, Delaware LANDIS RATH & COBB LLP

Adam G. Landis (No. 3407) Kerri K. Mumford (No. 4186) 919 Market Street, Suite 1800 Wilmington, DE 19801

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and -

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#### NOTICE OF VIDEO PERPETUATION DEPOSITION OF KAY VINSON

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure and Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Libby Claimants, through their undersigned counsel, will take the deposition of Kay Vinson. The deposition will commence on May 18, 2009, beginning at 1:30 pm, at the Venture Inn, 443 U.S. Highway 2 W., Libby, Montana, and will continue from day to day thereafter until complete. The deposition will proceed before an officer authorized by law to administer oaths and will be recorded by video and stenographic means. You are hereby invited to attend and examine the witnesses.

Dated: April 21, 2009

Wilmington, Delaware

LANDIS RATH & COBB LLP

Adam G. Landis (No. 3407) Kerri K. Mumford (No. 4186) 919 Market Street, Suite 1800 Wilmington, DE 19801

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